



Garry E. Lucas
Sheriff

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WC Docket No 12-375, FCC 12-167

**Federal Communications Commission: Rates for Interstate Inmate Calling Services
Comment on Proposed Rule Making**

The Clark County Sheriff's Office supports the principle that phone rates for inmate telephone calls should be reasonable. Inmates do better – both while incarcerated and once released – when they can remain in contact with their loved ones. We recognize the importance of inmates' communications with the outside. In determining which company will provide our inmate communication systems, we make the decision based on which will offer the best product – both for our institution and for those who are placing and receiving the calls – at the lowest call price. We have, in fact, turned down offers to increase our revenues based on higher call rates. We rejected those proposals, because the rates were unacceptably high, in our view, from the perspective of the inmates and their friends and family members.

At the same time, we assert that jail or prison telephone service is not the same as service offered in the community. Any rule passed to regulate phone call costs must take into consideration the unique nature of corrections and the important need to balance security needs and family contact.

The technology that our current inmate telecommunication provider offers has been a tremendous asset to the Sheriff's Office and to many other law-enforcement agencies. One of the great advantages of our current inmate communication system is the ability to monitor and record all calls going into or out of the jail.

Subsequently, all of those can be quickly and easily shared. The technology is relied upon heavily by other law enforcement agencies with whom we partner. As a result, we have been able to drastically improve our ability to increase the security of our facilities and improve public safety.

To demonstrate how the facility, outside agencies, and the public, have benefitted from the technology offered by our inmate communication system, we highlight that because of it we are able to do the following:

- monitor inmates who we are concerned may be suicidal;
- determine more easily the causes of violence and large-scale altercations, thereby reducing the risks in the future;

- receive information about potential threats within the jail from other law-enforcement agencies that are monitoring inmates' conversations, and
- prevent violations of no-contact orders and witness tampering.

There have been no major crime cases in the recent past where phone call recordings have not been relied upon. We have been able to protect better those people who have already been victims of crime, and we are able to prosecute crimes more quickly and at less cost to the public.

Because of the significant public safety benefits the technology our inmate communication system offers, we are extremely concerned about the proposed rate ceiling. Our view is that it will be terribly detrimental. We will no longer be able to pay for the system we currently have, or, at the very least, we will not have access to all of the features that have proven so helpful in preventing and prosecuting crime.

We oppose the proposed elimination of commissions to prisons or jails. The revenues generated by the communication system not only improve public safety, but the commissions shared with the Clark County Sheriff's Office go almost exclusively towards offsetting escalating health care cost for inmates. Consequently, this helps reduce to the County's general operating fund. Eliminating our ability to receive a commission from the inmate telecommunication system would necessarily be detrimental to the County and impact the services we provide.

We would urge the Commission to not impose a rate cap on, nor eliminate our ability to receive commissions from the inmate telecommunication system. Doing so could impact our ability to provide some services within our facilities. Any budget impact for law enforcement impacts public safety in some form. It also impacts the general fund budget as there is more demand for services with declining revenues.



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